

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY )  
LITIGATION )  
 ) MDL No. 2419  
 ) Dkt. No. 1:13-md-2419 (RWZ)  
\_\_\_\_\_) )  
THIS DOCUMENT RELATES TO: )  
 )  
All Cases Against the Saint Thomas )  
Entities )  
 )  
\_\_\_\_\_) )

**NASHVILLE HEALTHCARE DEFENDANTS' NOTICE OF EXERCISE OF  
BELLWETHER STRIKES**

Pursuant to the Court's July 9, 2015 order (Docket #2075) ("July 9 Order"), as modified by its November 24, 2015 order (Docket #2435) ("November 24 Order"), and January 20, 2016 order ("Docket #2596") ("January 20 Order"), the Nashville Healthcare Defendants<sup>1</sup> submit this Notice of Exercise of Bellwether Strikes relating to the MDL Plaintiffs bringing claims against them.

**NOTICE OF BELLWETHER STRIKES**

On October 19, 2015, the Nashville Healthcare Defendants jointly filed *Defendants' Notice of Exercise of Bellwether Strikes* (Docket #2337), in which they gave notice of their exercise of two of their four strikes as to the following bellwether candidates:

1. *Reed v. Ameridose, et. al.*, No. 1:13-cv-12565
2. *Rybinski v. Ameridose, et al.*, No. 1:13-cv-12818

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<sup>1</sup> Defendants Saint Thomas Outpatient Neurosurgical Center, LLC; Howell Allen Clinic, a Professional Corporation; John Culclasure, MD; Debra Schamberg, RN; Vaughan Allen, MD; Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

With this document, the Nashville Healthcare Defendants give notice to the Court and all parties that they are exercising their remaining two strikes under the Court's July 9, November 24, and January 20 Orders as to the following bellwether candidate cases:

3. *Sullivan, et al. v. Ameridose, et al.*, No. 1:13-cv-12781-RWZ
4. *Sharer, et al. v. Ameridose, et al.*, No. 1:13-cv-12577-RWZ

SAINT THOMAS WEST HOSPITAL,  
FORMERLY KNOWN AS ST. THOMAS  
HOSPITAL, SAINT THOMAS  
NETWORK, AND SAINT THOMAS  
HEALTH

By their attorneys,  
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\*\*Admitted pursuant to MDL Order No. 1

**CERTIFICATE OF SERVICE**

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 5th day of February, 2016.

/s/ Sarah P. Kelly

SARAH P. KELLY

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